

GULFCO FACT SHEET

DECLASSIFIED

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11/14/15

TOPIC

Approach for proceeding with Gulfco Site

REQUESTED ACTION

Concur with approach

CONFIDENTIAL

BACKGROUND INFORMATION

EPA and the Gulfco PRPs held a conference call on 2/8/09 to discuss the path forward.

CURRENT STATUS

The Gulfco PRPs are performing the RI/FS, which is about 75% complete.

FUTURE/PROPOSED APPROACH

- Negotiate a time-critical removal AOC for the above ground storage tanks in the southern area; include recovery of past/future costs. PRPs perform the removal.
- PRPs continue RI/FS required by the UAO.
- PRPs perform an "early" southern area RI/FS for soil, sediment, & surface water – southern OU (excludes ground water) meeting requirements (except schedule) of the UAO, for EPA approval. This "early" RI/FS will provide information for a southern OU ROD. PRPs provide a schedule for this work for planning purposes only. The early RI/FS will not trigger UAO requirements since its being done outside of the UAO.
- PRPs will place institutional controls (ICs) for the southern OU as necessary based on a commercial/industrial land use scenario & to restrict ground water use until a decision (ROD) is completed for the rest of the Site (i.e., ground water & the northern area).
- EPA issue a southern OU ROD based on "early" RI/FS findings.
- Performance of an "early" southern OU RI/FS and placement of any institutional controls would not be required in the AOC – a RI/FS it is already required by the UAO.
- EPA does a partial deletion for the southern OU after necessary actions are done.
- PRPs complete the RI/FS for the northern portion of the site and ground water required by the UAO. The "early" southern OU RI/FS will be included in the site-wide RI/FS – no duplication.

PURPOSE

Allow deletion & reuse of the southern area while the ground water investigation is continuing. The ground water is expected to take significantly longer since DNAPL may have contaminated a number of deeper water zones (two uppermost zones are now known to be contaminated).

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